

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DR. HANSEL M. DEBARTOLO)
Plaintiff,)
v.) Case No. 08-cv-1059
BLUE CROSS BLUE SHIELD OF) Chief Judge Holderman
ILLINOIS a/k/a BLUE CROSS AND BLUE) Magistrate Judge Cole
SHIELD ASSOCIATION and NORTHERN)
TRUST CORPORATION)

Defendants.

**AGREED MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING TO
DEFENDANTS' MOTION TO DISMISS**

Now comes the Plaintiff, DR. HANSEL M. DEBARTOLO ("DeBartolo"), by and through his attorneys, THE LAW OFFICES OF STUART P. KRAUSKOPF P.C., and moves for an extension of time until May 22, 2008 to file a responsive pleading to Defendants' Motion to Dismiss. Plaintiff states the following in support of this Agreed Motion.

1. Plaintiff's Complaint at Law was filed on February 20, 2008, seeking, among other things, recovery of benefits under an employee welfare benefit plan governed by Employee Retirement Income Security Act of 1974, 29 U.S.C. § 1001, et seq. ("ERISA").
2. Defendants filed their Motion to Dismiss Plaintiff's Complaint and Motion to Strike Plaintiff's Jury Demand on April 25, 2008.
3. Plaintiff's Response to Defendant's Motion to Dismiss is due on May 15, 2008.
4. Plaintiff requests an additional week, until May 22, 2008, to research the legal issues raised in Defendants' Motion to Dismiss so as to formulate a proper Response or otherwise proceed.

5. On May 12, 2008, Defendants' counsel agreed to a one-week extension of time for Plaintiff to file his responsive pleading.

WHEREFORE, Plaintiff, DR. HANSEL M. DEBARTOLO, respectfully requests a seven day extension of time, to and including May 22, 2008, to file his responsive pleading to Defendants' Motion to Dismiss.

Respectfully submitted,

s/STUART P. KRAUSKOPF
Stuart P. Krauskopf

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